

## **REMARKS**

Claims 24-32 and 36 are pending in this application. Claims 1-23 and 33-35 have been withdrawn. Claims 24-26, 29 and 30 have been amended herein. Support for these amendments may be found throughout the specification and in the FIGS., for example, paragraphs 0004-0008, 0043-0045 and FIG.12. Favorable consideration and allowance are respectfully requested.

### **I. Claim Objections**

Claim 25 has been objected to because the terms "first distal portion" and "second distal portion" lack antecedent basis.

Applicants have amended claim 25 to provide antecedent basis for "a first distal portion" and "a second distal portion."

Applicants respectfully request that the objection to claim 25 be withdrawn.

### **II. Claim Rejections**

#### **A. Claims 24 and 25**

Claims 24 and 25 were rejected under 35 U.S.C. §102(e) as being anticipated Eidenschink (U.S. 2005/01922656). A discussion of the relevance of the Eidenschink reference is provided below. However, Applicants' discussion of the Eidenschink reference is not to be construed as an admission that the reference is prior art. To the contrary, Applicants reserve the right to later provide arguments as to the whether the Eidenschink reference is prior art under 35 U.S.C. §102(e).

According to the Examiner, Eidenschink discloses a method of placing first (22) and second (24) stents into a bifurcation using a stent delivery device.

Applicants respectfully traverse the rejection based on Eidenschink. Applicants respectfully request reconsideration of the rejected claims in light of the traversals and the claim amendments discussed below.

Eidenschink is directed to a system for deploying a stent at a bifurcation. The stent 20 includes a first portion 22 and a second portion 24. (Paragraph 0035.) Stent 20 can be inserted through parent vessel 12 to bifurcation 10. (Paragraph 0036.) The stent 20 is deployed using system 30. System 30 includes a proximal catheter 32 having a lumen 34

disposed therein. First and second guidewire lumens (or tubes) 36 and 38 extend from within lumen 34 and extend to distal ends 40 and 42. (Paragraph 0038.) After the guidewires are positioned appropriately, system 30 is advanced using catheter 32 through the vasculature (and may be advanced through a guide catheter 58) to bifurcation 10. System 30 is then further advanced such that stent portion 24 follows guidewire 26 and resides within branch vessel 14. (Paragraph 0041.) In the deployed position, the outer diameter of stent portions 22 and 24 are sufficient to frictionally engage the interior vessel walls of parent vessel 12 and branch vessel 14, respectively. (Paragraph 0042 and FIG. 6.) Eidenschink fails to teach or suggest placing a first and second introducer in an adjacent configuration wherein an overall diameter of the first and second introducers is less than the sum of the first distal outer diameter and the second distal outer diameter.

In contrast, Applicants' claim 24 requires placing a first and second introducer in an adjacent configuration wherein an overall diameter of the first and second introducers is less than the sum of the first distal outer diameter and the second distal outer diameter. Claim 25 depends from newly amended claim 24. Therefore, the adjacent configuration required by claim 24 requires a reduced diameter that is not taught or suggested by Eidenschink.

Thus, Applicants respectfully assert that the claimed invention in claims 24 and 25 is not anticipated by Eidenschink. Applicants respectfully request the rejection of claims 24 and 25 under 35 U.S.C. §102(e) be withdrawn.

#### **B. Claims 26, 27 and 29**

Claims 26, 27 and 29 were rejected under 35 U.S.C. §102(b) as being anticipated by Dorros (U.S. 5,720,735). According to the Examiner, Dorros discloses a method of placing stents within branch lumens and a main lumen using the step of providing a first introducer having a first stent and providing a second introducer having a second stent and deploying the first stent.

Applicants respectfully traverse the rejection based on Dorros. Applicants respectfully request reconsideration of the rejected claims in light of the traversals and the claim amendments discussed below.

Dorros is directed to endovascular catheters used to deploy endovascular grafts or stents within the vessel. In the embodiment shown in FIG. 5, the catheter shaft 10 is formed by two coaxial sleeves 60 and 62 which extend from the proximal end of the catheter system to its distal end. The sleeves 60 and 62 bifurcate at the distal end of the catheter, with one sleeve being guided into one vessel branch 40 and the other sleeve 62 being guided in to vessel branch 42. A self-expanding stent 64 is mounted to the guide wire shaft 18 in one catheter branch and a self-expanding stent 66 is mounted to the guide wire shaft 20 in the other catheter branch. (See Col. 6, lines 3-15.) The catheter system is properly placed when the crotch 68 of the bifurcated catheter engages the bifurcated vessel wall. (Col. 6, lines 30-32.) Dorros fails to teach or suggest that the first and second introducers are disposed in an adjacent configuration wherein the overall diameter of the adjacent configuration is less than the sum of a first distal portion diameter and a second distal portion diameter.

In contrast, Applicants' newly amended claim 26 requires that the first and second introducers are disposed in an adjacent configuration wherein the overall diameter of the adjacent configuration is less than the sum of a first distal portion diameter and a second distal portion diameter. The adjacent configuration having a reduced overall diameter required by claim 26 is not taught or suggested by Dorros.

Claims 27 and 29 depend from claim 26 and therefore are also not taught or suggested by Dorros.

Thus, Applicants respectfully assert that the claimed invention in claims 26, 27 and 29 is not anticipated by Dorros. Applicants respectfully request the rejection of claims 26, 27 and 29 under 35 U.S.C. §102(b) be withdrawn.

### **C. Claims 30 and 31**

Claims 30 and 31 were rejected under 35 U.S.C. §102(e) as being anticipated by Globerman (U.S. 2006/0100694). A discussion of the relevance of the Globerman reference is provided below. However, Applicants' discussion of the Globerman reference is not to be construed as an admission that the reference is prior art. To the contrary, Applicants reserve the right to later provide arguments as to the whether the Globerman reference is prior art under 35 U.S.C. §102(e).

According to the Examiner, Globerman discloses a method of placing stents within branch lumens and a main lumen using the step of positioning the first (210) and second (220) stents within the first (103) and second (104) such that the distal portions extend at least partially within the first and second branch and proximal portions extend at least partially within the main lumen.

Applicants respectfully traverse the rejection based on Globerman. Applicants respectfully request reconsideration of the rejected claims in light of the traversals and the claim amendments discussed below.

Globerman is directed to a guidewire system. FIGS. 2A-F illustrate a process for treating a narrowed bifurcation using a guidewire channeling stent. Two guidewires 200 and 202, are provided in the branches 103 and 104 so that they line in the narrowings 108 and 112. A first balloon catheter 206 is provided over the two guidewires so that a balloon portion 208 and a stent 210 mounted on the catheter lie in narrowing 108. The balloon 208 is inflated so that stent 210 expands. A second balloon catheter 216 is brought over guide wire 204 and through an opening 214 in stent 210. Balloon 218 is inflated, fixing stent 200 in place. (See Paragraphs 0111-0117 referring to FIGS. 2A-F.) Globerman does not teach or suggest an adjacent configuration for the first stent and the second stent wherein the overall diameter in the adjacent configuration is less than the sum of a first stent portion diameter and a second stent portion diameter.

Applicants' claim 30 requires an adjacent configuration for the first stent and the second stent wherein the overall diameter in the adjacent configuration is less than the sum of a first stent portion diameter and a second stent portion diameter. Globerman fails to teach or suggest a reduced overall diameter in the adjacent configuration. Claim 31 depends from claim 30 and therefore is also not taught or suggested by Globerman.

Applicants respectfully assert that the claimed invention in claims 30 and 31 is not anticipated by Globerman. Applicants respectfully request the rejection of claims 30 and 31 under 35 U.S.C. §102(e) be withdrawn.

#### **D. Claims 26, 28, 30 and 32**

Claims 26, 28, 30 and 32 were rejected under 35 U.S.C. §102(b) as being anticipated by, or in the alternative, under 35 U.S.C. §103(a) as being obvious over

Carleton et al. (U.S. 6,142,973). According to the Examiner, Carleton et al. discloses a method of placing stents within branch lumens and a main lumen.

Applicants respectfully traverse the rejection based on Carleton et al. Applicants respectfully request reconsideration of the rejected claims in light of the traversals and the claim amendments discussed below.

Carleton et al. is directed to a balloon catheter having a body and first and second arms attached to one end of the body. A common inflation lumen extends along the body and branches in to each of the arms. (Abstract) In the embodiment shown in FIG. 5, stents 128 and 130 are provided on the balloons 122 and 123. A sleeve 126 acts to facilitate the retraction of the balloons and stents into the interior lumen of the catheter from which the dual balloon catheter is deployed. (Col. 6, lines 13-16.) Delivery of a single stent 124 to a bifurcated vessel is shown in FIG. 6. Carleton et al. fails to teach or suggest an adjacent configuration having an overall diameter that is less than the sum of the respective portions forming the adjacent configuration.

In contrast, Applicants' claimed invention in claims 26 and 28 requires that the first and second introducers are disposed in an adjacent configuration wherein the overall diameter of the adjacent configuration is less than the sum of a first distal portion diameter and a second distal portion diameter. Applicants' claimed invention in claims 30 and 32 requires an adjacent configuration for the first stent and the second stent wherein the overall diameter in the adjacent configuration is less than the sum of a first stent portion diameter and a second stent portion diameter. Carleton et al. fails to teach or suggest a reduced overall diameter in the adjacent configuration.

Therefore, Applicants respectfully request the rejection of claims 26, 28, 30 and 32 under 35 U.S.C. §102(b), or alternatively, under 35 U.S.C. §103(a), be withdrawn.

#### **E. Claim 36**

Claim 36 has been rejected under 35 U.S.C. §103(a) as being unpatentable over Globerman in view of Mikus et al. (2002/0035391). According to the Examiner, Globerman discloses a method as described above with the exception of providing an endoscope having a working channel.

Applicants respectfully traverse the rejection based on Globerman in view of Mikus et al. since the references alone or in combination fail to teach or suggest a method for placing first and second stents wherein the first introducer and the second introducer are placed in an adjacent configuration wherein an overall diameter of the first and second introducers is less than the sum of the first distal outer diameter and the second distal outer diameter.

Globerman has been discussed above. Mikus et al. discloses a stent delivery system for use in placing a stent within the prostatic urethra and ensuring that the stent does not interfere with the closure of the bladder neck sphincter. (Abstract.) Mikus et al. fails to teach or suggest providing a first introducer having a first distal outer diameter and a second introducer having a second distal outer diameter. Mikus et al. further does not teach or suggest an adjacent configuration as discussed above. Mikus et al. cannot make up the deficiencies of Globerman. All of the recited elements in Applicants' rejected claim 36 are not found in the Globerman and Mikus et al. references alone or in combination.

Therefore, Applicants respectfully request that the rejection of claim 36 under 35 U.S.C. §103(a) be withdrawn.

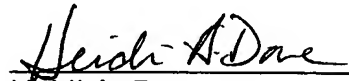
### III. Summary

Having carefully addressed the Examiner's objections and rejections, Applicants respectfully assert that the application is in condition for allowance. Allowance of the present claims is earnestly solicited.

Should the Examiner wish to discuss any of the above submissions in more detail, the Examiner is asked to please call the undersigned at the telephone number listed below.

Respectfully submitted,

Dated: March 2, 2007

  
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